

**Comments by the Northern California Water Association to the  
State Water Resources Control Board Workshop on Consideration of a Water Quality  
Control Plan for the San Francisco Bay / Sacramento-San Joaquin Delta Estuary  
February 23, 1995**

Mr. Chairman, members of the Board, my name is Richard Golb. I am the executive director of the Northern California Water Association (NCWA). NCWA represents over 45 agricultural water districts, water companies and private landowners, encompassing over 600,000 acres of farmland in the Sacramento Valley.

NCWA was a signatory to the December 15 Principles of Agreement, and continues to strongly support the December 15 Agreement. We believe that Agreement will provide sufficient protection for the fishery and biological resources of the Bay/Delta. We were also pleased the Agreement contained specific language directing the State Water Resources Control Board to act in compliance with all provisions of California water law, including the water rights priority system and the area of origin statutes.

As the Board considers the adoption of the Water Quality Control Plan, I offer the following recommendations;

The December 15 Agreement, Principles for Implementation of Category III, calls for a financial commitment of roughly \$60 million annually. Currently, there are a number of State and Federal programs and funding mechanisms, such as the Central Valley Project Improvement Act's Restoration Fund, that are focused on protecting many of the same fish species and habitat as the Water Quality Control Plan now before the Board. Before the Board levies any new or additional user fees, or financial contributions upon anyone, I believe the Board should undertake an exhaustive review of current programs to determine if existing funds or programs could be redirected.

I am not suggesting we eliminate successful programs now underway or that we delay the implementation of Category III activities. I am suggesting that the Board examine all current programs, and utilize existing State and Federal funds first. Many water users are currently funding many programs and projects, including the annual CVPIA \$50 million Restoration Fund.

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Finally, I recommend that the Board undertake a rigorous analysis of the possible social and economic consequences of the proposed Plan. As it is critical for the protections of the fish and biological resources of the Bay/Delta it is equally important that we recognize and understand the potential social and economic costs the environmental protections contained within the Bay/Delta may impose on California.

Thank you. I would answer any questions the Board or staff may have at this time.